

Thursday, June 13, 2024 at 22:58:50 Eastern Daylight Time

Subject: White v. Klein, et al. - Final request to meet and confer in advance of motion to compel and for sanctions
Date: Tuesday, June 4, 2024 at 9:00:24 AM Eastern Daylight Time
From: Gideon Oliver
To: hroman@roman-law.org
CC: hmisra roman-law.org, remy green, Regina Yu, Hiraoka JR., Joseph (LAW)

Good morning, Mr. Roman,

I have asked several times to meet and confer regarding Defendant Klein's deficient searches for documents and information in response to, production in response to, and written objections and responses to, Plaintiff's interrogatories and document demands in light of Defendant Klein's deposition testimony, which made it clear he had not searched for responsive documents and information, and that several of his written responses and objections were materially incorrect. For example, most recently, I asked to meet and confer on those topics on April 21, 2024 (*see* ECF 29), May 3, 2024, May 14, 2024 (*see* ECF 31), and May 22, 2024. You have not responded to those meet and confer requests.

Additionally, on May 10, 2024, I wrote you regarding the information and documents due 30 days after the first day of Defendant Klein's deposition, and, on May 14, 2024, I consented to your May 13, 2024 request to produce responsive documents and information and provide written responses and objections on May 20, 2024. On May 22, 2024, I wrote again, asking that we meet and confer about the lack of response. You have not responded to that meet and confer request.

If we have not met and conferred by close of business on Wednesday, June 5, 2024, we will make a motion to compel and for sanctions.

Best,
-Gideon

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He/Him/His

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